

Comment on NPRM WT Docket No. 04-140:

Taken as a whole, the NPRM addresses a number of important issues confronting the Amateur Radio Service with commendable insight.

I wish to limit my comment to the matter of **Multiple Vanity Applications** as addressed in paragraph 52 of the NPRM. Paragraphs 53 and 54 state the problem succinctly.

The proposed rule change providing for the dismissal of applications having the same first preferred call sign will not prevent multiple applications. Here is the problem:

Vanity applicants can choose a *known unavailable* call sign as their first choice thereby making their second choice (the call sign of interest) their effective first choice. This will circumvent the intent of the rule. Applicants can make any number of applications with an apparent different first choice (each unavailable) and end up with multiple applications for the call sign of interest.

Proposed Solution:

The current implementation of the ULS Online Filing System must be modified to accept only one vanity application from any individual filer (identified by FRN) on any given day. In any subsequent sign-on by the same user the system would simply not offer the vanity filing option.

No significant inconvenience would result from this limitation. The applicant can always sign-on again later the same day to change the call sign preference list of an application filed earlier.

Club vanity applications need additional scrutiny. If the applicant is a club rather than an individual, a trustee responsible for a number of club calls can effectively file multiple applications to obtain a desired call sign for the club. This is because there are cases currently in the ULS database wherein each club call sign has been set up with its own unique FRN. The trustee can merely file an application under each FRN, not caring which of the applications succeeds. To close this loophole one further step is needed. In the case of club vanity applications the Online Filing System must further identify the applicant by the trustee call sign and allow the *trustee* only one club vanity application on any given day.

As a retired computer systems analyst I have given considerable thought to this issue from two perspectives. Firstly, the proposal must be easily integrated with the current ULS Online Filing System software using information *already available* in the ULS database. Secondly, the proposal must follow the intent of FCC to provide “equity and fairness” to vanity filers in their quest for scarce and vied-for call signs. I believe this proposal achieves these goals.

Respectfully submitted,

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